FILED

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WILLIAM T. WALSH CLERK

MARK W. CATANZARO, ESQUIRE

Blason IV - Suite 208 513 S. Lenola Road Moorestown, New Jersey 08057 (609) 235-4266 By: Mark W. Catanzaro, Esquire (MWC 7126) Attorney for Defendant, Richard Pepsny

> UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY NEWARK VICINAGE HONORABLE WILLIAM G. BASSLER

WALSH SECURITIES, INC.,

Plaintiff, : Civil Action No. 97cv3496(WGB)

vs.

CRISTO PROPERTY :

MANAGEMENT, LTD., a/k/a ANSWER TO CROSS-CLAIM OF G.J.L. LIMITED, et al, DEFENDANT RICHARD CALANNI

Defendants.

Defendant, Richard Pepsny, having his principal place of business at 2005 Route 35 in the Township of Middletown, County of Monmouth, State of New Jersey, by way of answer to the Cross-Claim of Defendant Richard Calanni, say:

1. Answering defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of

paragraph one through seven except to repeat and re-allege his Answer to Plaintiff's Amended Complaint.

WHEREFORE, defendant Richard Pepsny demands judgment dismissing Richard Calanni's Cross-Claim together with costs and reasonable attorneys fees.

COUNT ONE

- 1. Answering defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph eight of the Counter-Claim and Cross-Claim except to repeat and re-allege his Answer to Plaintiff's Amended Complaint.
- 3. Answer defendant denies the allegations of paragraph nine.

WHEREFORE, defendant Richard Pepsny demands judgment dismissing Richard Calanni's Cross-Claim together with costs and reasonable attorneys fees.

COUNT TWO

- 1. Answering defendant repeats and re-alleges his answer to paragraph one through nine as if the same were set forth at length herein.
- 2. Answering defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph eleven except to repeat and re-allege his Answer to

Plaintiff's Amended Complaint.

3. Answering defendant denies the allegations of paragraph twelve.

WHEREFORE, defendant Richard Pepsny demands judgment dismissing Richard Calanni's Cross-Claim together with costs and reasonable attorneys fees.

COUNT THREE

- 1. Answering defendant repeats and re-alleges his Answers to paragraphs one through eleven as if the same were set forth at length herein.
- 2. Answering defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph thirteen or fourteen except to repeat and re-allege his Answer to Plaintiff's Amended Complaint.
- 3. Answering defendant denies the allegations of paragraph fifteen.

WHEREFORE, defendant Richard Pepsny demands judgment dismissing Richard Calanni's Cross-Claim together with costs and reasonable attorneys fees.

DATED: January 16, 1998

Mark W. Catanzaro, Esquire

FILED

JAN 2 0 1998

AT 8:30 M WILLIAM T. WALSH

MARK W. CATANZARO, ESQUIRE

Blason IV - Suite 208
513 S. Lenola Road
Moorestown, New Jersey 08057
(609) 235-4266
By: Mark W. Catanzaro, Esquire (MWC 7126)
Attorney for Defendant, Richard Pepsny

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY NEWARK VICINAGE HONORABLE WILLIAM G. BASSLER

WALSH SECURITIES, INC.,

Plaintiff, : Civil Action No. 97cv3496(WGB)

vs.

ANSWER TO CROSS-CLAIM OF CRISTO PROPERTY : DEFENDANTS CAPITAL ASSETS

MANAGEMENT, LTD., a/k/a PROPERTY MANAGEMENT &

G.J.L. LIMITED, et al, : INVESTMENT CO., INC., CAPITAL

ASSETS PROPERTY MANAGEMENT &

Defendants. : INVESTMENT CO., L.L.C. AND

GARY GRIESER

:

Defendant, Richard Pepsny, having his principal place of business at 2005 Route 35 in the Township of Middletown, County of Monmouth, State of New Jersey, by way of answer to the Cross-Claim of Defendants Capital Assets Property Management & Investment Co., Inc., Capital Assets Property Management & Investment Co., L.L.C.

and Gary Grieser, say:

1. Answering defendant denies that he is responsible for contribution to Capital Assets Property Management & Investment Co., Inc., Capital Assets Property Management & Investment Co., L.L.C., Gary Grieser and/or any other defendant in this litigation.

WHEREFORE, defendant Richard Pepsny demands judgment dismissing Capital Assets Property Management & Investment Co., Inc., Capital Assets Management & Investment Co., L.L.C. and Gary Grieser's Cross-Claim together with costs and reasonable attorneys fees.

DATED: January 16, 1998

By:_

Mark W. Catanzaro, Esquire